

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**CERTIFICATION OF COUNSEL REGARDING APPROVAL OF JOINT  
STIPULATION REGARDING CLAIMS OF ALTO CONYERS PLAZA, LP**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned case, and ALTO Conyers Plaza, LP (“Landlord” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation and hereby certify as follows:

1. The Landlord’s lease was rejected effective April 30, 2025.
2. On or about March 25, 2025, the Landlord filed a Proof of Claim designated as Claim No. 7610.
3. On or about April 2, 2025, the Landlord filed a Proof of Claim designed as Claim No. 9346, which amended Claim No. 7610.
4. On or about April 2, 2025, Landlord filed a Proof of Claim designated as Claim No. 10673, which amends Claim No. 9346. Claim No. 10673 asserts claims totaling \$701,870.04, including administrative expense claims totaling \$19,398.19.
5. The administrative rent claim portion of Claim No. 10673 has been paid.

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

6. Plan Administrator and Landlord hereby agree to resolve the administrative claims set forth in Claim No. 10673 by the allowance and payment of \$19,398.19 as an administrative expense claim, and further agree that upon the filing of this Certification the administrative expense claims set forth in Claim No. 10673 shall be deemed withdrawn with prejudice.

7. For the avoidance of doubt, the general unsecured portion of Claim No. 10673 shall remain on the Claims Register, subject to the GUC Trust's further objection on any substantive or non-substantive grounds.

8. This Stipulation resolves *Plan Administrator's Eighteenth (Non-Substantive) Omnibus Objection to Certain Superseded Claims* [Docket No. 1879] (the "Superseded Objection") solely as to Claim Nos. 7610, 9346, and the administrative portion of Claim No. 10673. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Superseded Objection that is consistent with this Stipulation.

9. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

10. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the "Proposed Order").

11. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

12. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

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Dated: January 9, 2026  
Wilmington, Delaware

/s/ Patrick J. Reilley

**COLE SCHOTZ P.C.**

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- and -

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